FILED
IN CLEANS OFFICE
2018 AUG 28 AM II: 46
U.S. DIPTRICT COURT
DISTRICT OF MASS.

## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Crim. No. 18-300 37 -MGM

v.

RYAN MCDOWELL,

Defendant.

**VIOLATIONS:** 

Title 26, United States Code, Section 7206(1) – Tax Fraud (Counts 1-6)

## **INFORMATION**

The United States Attorney charges:

COUNT ONE THROUGH SIX: 26 U.S.C. § 7206(1) - Tax Fraud

1. On or about the following dates, in the District of Massachusetts and elsewhere,

## RYAN MCDOWELL,

defendant herein, a resident of Springfield, Massachusetts, did willfully make and subscribe the following tax returns, which contained and were verified by a written declaration that each was made under the penalties of perjury, which were prepared and signed in the District of Massachusetts and were filed with the Internal Revenue Service, and which defendant did not believe to be true and correct as to every material matter, to wit, each of the following returns fraudulently omitted from the purported total income the following approximate amounts of cash and non-payroll checks that defendant received in connection with his position as an Assistant Golf Professional at Franconia and Veterans Memorial Golf Courses in Springfield, MA:

Count	Date	Tax Year, Return, and Line	Amount of Income Omitted
One	02/09/2012	2011, Form 1040A, line 15	\$21,360
Two	03/20/2013	2012, Form 1040, line 22	\$37,314
Three	03/17/2014	2013, Form 1040, line 22	\$28,041
Four	03/19/2015	2014, Form 1040, line 22	\$46,350
Five	03/01/2016	2015, Form 1040, line 22	\$36,324
Six	02/25/2017	2016, Form 1040, line 22	\$11,550

All in violation of Title 26, United States Code, Section 7206(1).

ANDREW E. LELLING United States Attorney

By:

/s/ Steven H. Brestow

STEVEN H. BRESLOW Assistant U.S. Attorney

Dated: July 31, 2018